

ARTICLE 2
INITIATION OF PROCEEDINGS

Assign
ENDORSED
FILED IN MY OFFICE THIS

STATE OF NEW MEXICO
VS

Adam M. Casaus

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
IN THE METROPOLITAN COURT

MAR 26 2013
CLERK DISTRICT COURT

NAME: Adam M. Casaus

ADDRESS: Albuquerque, NM 87114

DOB: 11-11-1977
SSN: -2128

ARREST DATE:
Driver Lic. #:

Citation #:
Arrest #:
Docket #:

CRCR-13 00 14 46

CHARGE (S): Homicide By Vehicle (Reckless Driving), Great Bodily Injury by Motor Vehicle (Reckless Driving)
Date filed:

Complainant or Officer: Leonard R. Armijo BCSO #3577

CRIMINAL COMPLAINT/STATEMENT OF PROBABLE CAUSE

The undersigned, under penalty of perjury, complains and says that on or about the 10 th day of February, 2013, in the County of Bernalillo, State of New Mexico, the above-named defendant did:

Operate a motor vehicle careless imprudent manner, During my Investigation, post crash investigation, witness' interviews, driver's statement, road evidence, debris field, yaw marks, the damaged sustained by both vehicles, the CDR/ SRS information and final rest of the 2 vehicles involved I was able to learn that the APD Vehicle (Vehicle # 1) was driven by Sgt. Casaus Westbound on Paseo Del Norte Upon his approach to the intersection of Paseo Del Norte and Eagle Ranch Road he had his emergency lights activated entering the intersection on a solid red light. Vehicle 2 was driven by Miss Lindsey Browder Northbound on Eagle Ranch Rd. She entered the intersection on a green light. Based upon the independent witness statements, Vehicle # 1 had continued Westbound without slowing down and knowingly entering the intersection on a red light crashing into the right side of Vehicle # 2. Vehicle # 1's intrusion into the right side of vehicle resulted in the right front passenger (Miss Ashley Browder) being fatality injured, The passenger (Miss Lindsey Browder) being injured, injuries sustained were a broken back. The crash was a T-bone type crash.

Upon my arrival at approximately 0228 hours I was contacted by Sgt. P. Watkins, Albuquerque Police Department's Chief R. Shultz, and Sgt. Z. Cotrell, During our brief conversation I was informed by Sgt. Paul Watkins that the Bernalillo County Sheriff's Department would conduct the initial investigation. Members of APD Traffic Unit and New Mexico State Police officers would shadow our investigation and assist as a multi-agency jurisdiction investigation due to the crash had involved a member of APD identified as Sgt. Adam Casaus.

APD Traffic Unit Officer J.T. Stone, NMSP Officer L. Millian, NMSP Officer J. White and NMSP MTD Officer S. Lundy were introduced to me as part of my team. We were given a brief introduction to the crash scene. Once the briefing was concluded I began my at scene crash investigation walking the entire crash scene from West to East, then North to South. I observed 2 vehicles had been involved in the crash. Vehicle # 1 was a marked Albuquerque Police Department patrol vehicle - a 2007 Chevrolet Tahoe SUV displaying New Mexico license plate G-69694 (Vehicle identification number 1GNEC03087R364611) this vehicle (# 1) had sustained heavy to severe front end damage rendering the vehicle disabled. It traveled to final rest in the Northwest corner of the intersection. Vehicle # 2 was a 1999 Honda CRV displaying New Mexico license plate MNZ-632 (Vehicle identification number JHLRD1862XC072274). Vehicle # 2 had sustained heavy to severe damage to the entire right side coming to final rest outside of the intersection of Paseo Del Norte and Eagle

**ARTICLE 2
INITIATION OF PROCEEDINGS**

**STATE OF NEW MEXICO
VS**

Adam M. Casaus

**STATE OF NEW MEXICO
COUNTY OF BERNALILLO
IN THE METROPOLITAN COURT**

NAME: Adam M. Casaus

ADDRESS: Albuquerque, NM 87114

DOB: 4/19/1977
SSN: -2128

ARREST DATE:
Driver Lic. #:

Citation #:
Arrest #:
Docket #:

CHARGE (S): Homicide By Vehicle (Reckless Driving), Great Bodily Injury by Motor Vehicle (Reckless Driving)
Date filed:

Complainant or Officer: Leonard R. Armijo BCSO #3577

CRIMINAL COMPLAINT/STATEMENT OF PROBABLE CAUSE

Ranch also on the Northwest corner. I observed a deceased young female in Vehicle's # 2 right front passenger seat. I continued walking East and observed a large debris field to include but not limited to; glass, vehicle parts, fluid trails, gouge marks, yaw marks, and personal effects. I also located vehicle tire tracks had driven through the entire scene tracking through the fluid trails and through the debris field. The tracks appeared to be from Albuquerque Fire and Rescue Department, Rescue 21 and Engine 21, as well as possibly being from Albuquerque Ambulance Paramedics which had responded to the crash. These vehicles had driven through the scene contaminating and or dislodging vehicles parts that were in the roadway from their final rest position. The scene had been secured just prior to my arrival. I identified several yaw marks along with a approximate point of impact.

Contrary to Section(s) 66-8-101 (A), 66-8-101 (B)

NMSA 1978

I SWEAR OR AFFIRM UNDER PENALTY OF PERJURY THAT THE FACTS SET FORTH ABOVE ARE TRUE TO THE BEST OF MY INFORMATION AND BELIEF. I UNDERSTAND THAT IT IS A CRIMINAL OFFENSE SUBJECT TO THE PENALTY OF IMPRISONMENT TO MAKE A FALSE STATEMENT IN A CRIMINAL COMPLAINT.

Subscribed and sworn to me in the above named county of the State of New Mexico this 26 day of March, 2013

Oliver Davis my commission expires 4
JUDGE, notary, or other officer January 26, 2016
authorized to administer oaths

Ray Montano
APA

Le R. S. 3577
Affiant

Deputy Sheriff
Rank

5-12 3710
Supervisor

SERGEANT
Rank